



Environment, Health and Safety Division
Environmental Services Group

February 20, 2001
EP-01-008

Mr. Dennis Mishek
Section Leader
San Francisco Bay Regional Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Mr. Michael Rochette
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Groundwater Monitoring in Response to Superfund Requirements

Dear Mr. Mishek and Mr. Rochette:

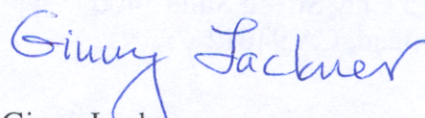
We appreciate the Board's efforts in providing a staff member to participate in Berkeley Lab's Environmental Sampling Project Task Force. As you may know, with input from the Task Force, we are engaged in finalizing a sampling plan to meet the EPA requirements for the Hazard Ranking System, in an effort to provide the EPA with information which will enable them to decide if the Lab is eligible for the National Priorities List (Superfund).

We believe you are also aware that Berkeley Lab is performing a comprehensive investigation, through its Environmental Restoration Program (ERP), that includes groundwater and soil-pore water sampling. This investigation is designed to meet the requirements of the Resource Conservation and Recovery Act (RCRA), and has been conducted in accordance with these requirements for the past 10 years. Thorough review and approval of ERP activities has been provided by a number of regulatory agencies, including the Department of Toxic Substances Control, the Regional Water Quality Control Board, and the City's Toxics Management Division. Recommendations from these agencies have been addressed in the development of ERP work plans and investigation reports. Sampling results are published in quarterly progress reports and these are sent to the regulatory agencies and to the information repository at UC Berkeley's Doe Library.

At this point, it seems unlikely that there would be any added value to the incorporation of groundwater and soil-pore water sampling into the proposed tritium sampling plan which is being developed to meet Superfund requirements for site evaluation. For RCRA and Superfund purposes, samples are analyzed by the same techniques; however, quality assurance requirements are different for each law. Duplication of sampling performed for RCRA purposes merely in order to meet Superfund QA requirements would provide little or no new information at substantial additional cost. The Board's representative, Mr. Rochette, remarked at a recent ERP quarterly meeting that it was not the Board's intent to require Berkeley Lab to do any further groundwater monitoring to satisfy Superfund requirements over and above what has already been done within the framework of the extensive RCRA program monitoring.

Please let me know if you concur with this reasoning. Thank you for considering this matter.

Sincerely,

A handwritten signature in blue ink that reads "Ginny Lackner". The signature is fluid and cursive, with the first name "Ginny" and last name "Lackner" clearly distinguishable.

Ginny Lackner
Water Quality Program Manager

Cc: I. Javandel
D. McGraw
R. Pauer
G. Zeman
N. Al-Hadithy, COB